

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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LESTER LEE, *

PLAINTIFF, *

V. * Case No.

BROOKSIDE PARK CONDOMINIUM, * 8:24-CV-01205-TJS
INC., METROPOLIS (aka MCM,
INC.), RAMMY AZOULAY *
AND LAMONT SAVOY,

*

DEFENDANTS.

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DEPOSITION OF LESTER A. LEE, JR.
APPEARING REMOTELY FROM
OXEN HILL, MARYLAND

February 28, 2025

12:00 p.m.

REPORTED BY:

Dawn L. Halcisak, CLR

APPEARING REMOTELY FROM CRISFIELD, MARYLAND

1 A. Yes, sir.

2 Q. Were you living at the union where
3 -- that we're involved with today?

4 A. No, sir.

5 Q. It's not -- not the unit involved in
6 this case?

7 A. No, sir.

8 Q. Okay. And what happened when you
9 were -- you were electrocuted?

10 A. I was walking my dog barefoot, it
11 had just rained. And the prior -- days
12 prior, I noticed that my dogs would jump over
13 a patch of concrete coming out of -- out of
14 the -- up the steps. I just thought maybe it
15 was some -- something -- urine or something
16 from another animal -- from a fox or
17 something. They were just jumping over it.

18 So the day I was barefoot, had a
19 metal -- had -- had a metal chain and stepped
20 on the packs. And when they went -- when my
21 dog went to urinate, as soon as his urine hit

1 the ground, they completed the ground and my
2 hair was raised up on my head. My heart
3 started beating. And if it wasn't my foot --
4 my dog pulling me off, I -- I wouldn't be
5 here right now.

6 Q. When did that happen? What year?

7 A. Do you mind if I look on my phone
8 and get that information?

9 Q. Not at all.

10 A. Okay. Jud Lipowitz was the
11 attorney.

12 Q. What was it again? I can't hear
13 you.

14 A. Jud Lipowitz of Azrael, Franz --
15 Stewart Rogel was here. Stewart was here.

16 Q. Okay. And what unit were you living
17 in at that time?

18 A. 584.

19 Q. So that's -- is that the one that's
20 owned by Mr. Savoy?

21 A. No, sir.

1 mine, I guess, introduced me to Mr. Savoy.

2 Q. When -- do you remember when that
3 was?

4 A. Yeah. That was 2019.

5 Q. 2019.

6 Okay. So you were introduced to
7 Mr. Savoy and you moved into Brookside in
8 2019. And what unit was that?

9 A. That was 564.

10 Q. 564?

11 A. Yes.

12 Q. And that's the one we're here for in
13 this case, right?

14 A. Yeah.

15 Q. Okay. And when you moved into 564,
16 when you -- when you -- when you -- I guess
17 you signed a lease, is that what you did?

18 A. Yes.

19 Q. Did you actually physically move in
20 there and live in that unit?

21 A. Yes.

1 Q. Okay. And how long did you live in
2 that unit?

3 A. Six years. Until -- up until what,
4 2000 -- what was it? Last year, until 2024.

5 Q. Until 2024.

6 Okay. Now, there came a point in
7 time when you left that unit, right?

8 Can you hear me?

9 A. Yeah, I -- yes I can.

10 Q. When did you leave that unit?

11 A. I would like to say about
12 three weeks after the unit was condemned.

13 Q. Okay. And when you left that unit,
14 where did you go?

15 A. Homeless. I was homeless.

16 Q. For how long?

17 A. I was homeless for about -- about
18 four days. So I was able to get into a
19 hotel.

20 Q. And how long did you live in a
21 hotel?

1 about, you know, your history with -- with
2 dogs. So -- so I guess, you know, you've
3 testified you first came into Brookside --
4 what year was that you were saying?

5 A. '17 -- 2017.

6 Q. 2017.

7 A. That's right.

8 Q. When you first moved into Brookside
9 in 2017, did you have any dogs?

10 A. Yes, sir.

11 Q. What kind of dogs?

12 A. Service dogs.

13 Q. How many service dogs did you have
14 at that time?

15 A. Two service dogs. Two. Both of
16 them were registered with Prince George's
17 County.

18 Q. What were the names of those dogs?

19 A. Cashmere and Mama.

20 Q. Cashmere and Mama?

21 A. Yes.

1 Q. When you -- when you moved into that
2 unit -- and I'm trying to think of the number
3 of that unit.

4 A. 584.

5 Q. That first unit, 584, did you
6 register those dogs with Brookside?

7 A. I did not have to.

8 Q. So the answer would be, no, you
9 didn't register them?

10 A. No. But the -- the landlord was --
11 well, I was paying the pet -- pet fee -- pet
12 -- well, no -- yeah. Yeah, he was aware.

13 Q. What do you mean, you were paying a
14 pet fee to the landlord? Is that what you're
15 saying?

16 A. I don't recall. I was thinking --
17 but I do know he -- he knew I had pets. He
18 knew I had dogs.

19 Q. And during that time you lived in
20 that unit, were those the only dogs that you
21 had?

1 A. Yes.

2 Q. And what was the breed of those two
3 dogs?

4 A. One was a Staffordshire terrier, the
5 other one was an American Pit Bull.

6 Q. American Pit Bull?

7 A. Yes.

8 Q. What's the difference between a
9 Staffordshire terrier and a pitbull?

10 A. They're in the same terrier family.

11 Q. Okay. When had you gotten those two
12 dogs?

13 A. I had those dogs, I want to say at
14 least four years prior -- five -- five years
15 -- but one -- one -- one I had five years
16 prior. So that would be, what, 2012? The
17 other one I got in, like, 2014.

18 Q. Okay. And at the time that you
19 lived in that first unit at Brookside, were
20 those the only two dogs that you had?

21 A. I think you -- yes. Yes. Those

1 were the only two dogs. That -- that is the
2 same question, correct, that you just asked
3 me. But I -- I don't know if I -- I heard it
4 differently, so.

5 Q. I'm just trying to see, you know,
6 you said you moved in with two service dogs?

7 A. Yes.

8 Q. But my question is: Did you own any
9 other dogs when you lived with them?

10 A. No. No, I did not.

11 Q. Okay. Now, those two dogs that
12 you're saying are service dogs, you know, is
13 one of them -- are they both service dogs, or
14 is one of them an emotional support dog, or
15 what?

16 Because I think your complaint says
17 they're both --

18 A. They're both service dogs.

19 Q. So they're not emotional support
20 dogs then?

21 A. No.

1 A. When I moved in?

2 Q. Yeah.

3 A. Yes.

4 Q. How about during the entire time you
5 lived there, did you ever own any other dogs
6 and have them in that unit that Mr. Savoy
7 owns?

8 A. Yes.

9 Q. Can you -- can you, sort of, walk me
10 through what dogs you had in there?

11 A. I really can't, offhand, remember.
12 Because some -- some of the dogs were -- I
13 was dog sitting and other ones were rescues
14 that I turned over to animal shelter.

15 Q. When you moved in with Mr. -- In
16 Mr. Savoy's unit, I did -- I take it you
17 signed a lease; is that correct?

18 A. Yes, sir.

19 Q. And, at that time, did you register
20 your dogs with Brookside?

21 A. I was not aware that I had to.

1 Nobody had ever told me. No. And -- but I
2 did, like I said, know that Mr. Savoy -- I
3 did put it in the lease, that, you know, I do
4 have two service animals. And although I
5 told him I wasn't supposed to have to pay a
6 pet deposit, he insisted. And he said he
7 would not do it unless I paid the pet
8 deposit. So what was I to do?

9 Q. Well, I just want to make sure I get
10 an answer.

11 So you did not register the dogs
12 with Brookside; is that correct?

13 A. That is correct.

14 Q. Okay. So -- so when you moved into
15 Mr. Savoy's unit, how did things go during --
16 when you lived there?

17 MR. ROSENTHAL: Objection as to
18 form.

19 BY MR. DWYER:

20 Q. Can you sort of take me through your
21 -- your tenancy there?

1 A. Yes, I was.

2 Q. Pardon.

3 A. Yes, I was.

4 Q. Where were you sleeping?

5 A. I was Sleeping on the mattress --
6 the mattress on the floor. And a pulled-out
7 couch.

8 Q. Did you have any other place where
9 you were living, at that time when the health
10 inspector came?

11 A. No, sir.

12 Q. Can you give me the names of some of
13 the other dogs that you had -- that you lived
14 -- that lived in your unit when you -- when
15 you lived in Mr. Savoy's unit?

16 A. I can't recall their names.

17 Q. Well, how many other dogs would you
18 say you had during the time you lived in
19 Mr. Savoy's unit?

20 A. You would have to ask me that
21 question again. That I had owned or -- or

1 rescued? Because rescues, I told -- I -- I
2 don't know.

3 Q. Either. Either owned or rescued.

4 A. I don't remember.

5 Q. Well, can you give me an estimate?
6 Was it more than five dogs or less than five
7 dogs?

8 A. I -- I couldn't even give you a fair
9 estimate.

10 Q. I mean, you're the one that's living
11 your life. I can't -- I can't put the -- I
12 can't answer that for you.

13 MR. ROSENTHAL: Objection,
14 argumentative of counsel.

15 MR. DWYER: I'm not trying to argue,
16 I'm trying to help -- be helpful. How can
17 you say that?

18 Let's see if I can approach it
19 another way.

20 BY MR. DWYER:

21 Q. Did there -- did there come a point

1 in time, when you lived in Mr. Savoy's unit,
2 when -- when your dog got -- got -- injured
3 another dog or something to that effect? Do
4 you remember that?

5 A. It wasn't my dog. But, yes, I do
6 remember that incident.

7 Q. What -- what happened?

8 A. What happened?

9 Q. Yeah.

10 A. I'm trying to figure out the best
11 way to -- basically, the dog would be in the
12 window just watching people walk by. And my
13 neighbor would walk her dog every day and
14 would wave at the dog. She would stand there
15 for 10, 15 minutes waving at the dog. This
16 went on for about a month.

17 Q. What's her name?

18 A. Hope.

19 Q. So what happened?

20 A. So I was locking him up. I was
21 coming out to walk -- walk the dog. And the

1 dog got off the leash. And by -- by -- by --
2 the dog sinking that she was his friend
3 because she -- he always saw her and waved at
4 her and, you know, he even wagged his tail.
5 He thought she was friendly.

6 When she saw the dog approaching her
7 -- the dog wasn't barking, wasn't aggressive
8 -- when she saw the dog approaching her, she
9 threw her dog in the air at -- at the dog.
10 Threw her purse, threw her cell phone, and
11 started running, and started hollering.

12 At that point, the dog that was in
13 my possession panicked. He didn't know what
14 was going on. All he saw was a dog running
15 at him. He neutralized the dog. He did not
16 try to kill the dog. He did not -- all he
17 did was put his paws on the dog and held the
18 dog down. At that point, I was there. I
19 told him to stop, let the dog go. The dog
20 ran back into the house.

21 Q. Was the other dog injured?

1 A. At that time, the dog was still
2 breathing, was running, there was no blood.
3 My dog -- my -- the dog in my possession had
4 not -- did not bite him. But later on that
5 evening, I inquired about the dog, and she
6 told me the dog had passed.

7 Q. Was -- was the dog that you're
8 saying your dog, was that Mama -- Mama or
9 Cashmere?

10 A. No.

11 Q. No?

12 A. No.

13 Q. Who -- what was the name of that
14 dog?

15 A. I don't remember.

16 Q. I mean, how did that dog happen to
17 be living with you -- with -- do you
18 remember?

19 A. Okay. Well, yes. A friend of mine,
20 they had moved to an apartment building where
21 they did not -- they could not have pets. So

1 they wanted me to hold the dog until they
2 could find a suitable home.

3 Q. So how long did you have that dog?

4 A. Maybe two months.

5 Q. Did you -- did you -- so when you
6 had that dog, did you have three dogs then?
7 Is that what it was?

8 A. I had Mama, I had Cashmere, I had
9 that dog.

10 Q. Did you ever have more than three
11 dogs when you were living in Mr. Savoy's
12 unit?

13 A. Not that I recall.

14 Q. When -- when the health inspector
15 came and inspected Mr. Savoy's unit, is it
16 correct that there were three dogs in -- in
17 the unit at that time?

18 A. When -- you said when -- when
19 Mr. Savoy came?

20 Q. No, when the --

21 A. The health inspector came --

1 Q. McLaurin the -- the -- the guy
2 that -- that came and inspected your house on
3 behalf of -- the unit -- on behalf of the
4 county. He took a picture, I'll show you
5 later, but there were three dogs in cages.

6 A. Okay.

7 Q. What, what dogs were those?

8 A. Those were, yeah, Mama and two other
9 dogs.

10 Q. So when Cashmere died, you got
11 another, another pit -- another pit bull?

12 A. No.

13 Q. What happened? How did you come up
14 with that?

15 A. I didn't do that. I only -- I only
16 have one pitbull I would say. The other dogs
17 are American Bulldogs, not pit bulls.
18 They're not even in the terrier family.

19 Q. So is that what you have now, is
20 three dogs, Mama and two --

21 A. I'm not -- I'm not sure. What I

1 BY MR. DWYER:

2 Q. Mr. Lee, you -- holding that dog,
3 you -- you probably knew I was going to ask
4 you who that dog is, didn't you?

5 A. I'm sorry.

6 Q. What's that dog's name?

7 A. This is Mama --

8 Q. Okay.

9 A. -- Mama -- Mama can sense that
10 something's wrong. And, you know, when --
11 when I -- anxiety comes and -- and -- it's --
12 it's okay. Let's -- let's go.

13 Q. Well, I'm not trying to -- I'm not
14 trying to make you anxious, but -- but you
15 understand it's my job to ask these
16 questions. So I'm going to ask them. If you
17 -- if you need a break or, you know --

18 A. I -- I do understand.

19 Q. Okay. All right.

20 A. Let's move forward.

21 Q. Okay. So -- so when you first, when

1 -- when you first moved into Brookside, you
2 already owned Mama and Cashmere, right?

3 A. Yes.

4 Q. Had they -- had they been designated
5 as service animals before that time?

6 A. Yes.

7 Q. When were they first designated as
8 service animals?

9 A. I have the paperwork, I'm just
10 trying to see the date on it. I know the --

11 Q. Maybe it'll help, like, where were
12 you living, at that point, when they were --
13 when you first had them as a service animal?

14 A. They were first registered as
15 service animals in 2018 and in Prince
16 George's -- they were registered in Prince
17 George's County in 2018.

18 Q. And what was it that -- that Mama
19 was -- what was the service that Mama was
20 doing?

21 Is -- is that the way it works?

1 A. That --

2 Q. What -- what would she do?

3 A. Mama was able to sense the onset of
4 seizures and could revive me, and also was
5 trained -- if I had a -- a home -- home phone
6 there, there's a system where it's like a pad
7 and they hit the shapes and color -- the
8 shapes and pattern down to place 911.
9 Also --

10 Q. She could call 911?

11 A. Yeah. And she -- she also can
12 revive me. I was cooking one time, I had a
13 seizure. The next thing I know, I wake up on
14 the floor, she's on top of my chest. Like,
15 wow. So -- Cashmere dealt with the anxiety.
16 And also, Cashmere could sense when my sugar
17 -- either my -- if my blood sugar level
18 dropped or if also I was on -- what is it? I
19 forgot the medication. The medication I was
20 on, if I were not -- if it dropped too low in
21 my system, she could tell, and would

1 Association was aware of that, but they let
2 it ride anyway just because they wanted --
3 that's -- that's how badly they wanted me out
4 of there, that they were willing to allow him
5 to break the law just to get me out of there.

6 So they were complacent with him
7 breaking the law. So they -- because I
8 finally saw some paperwork stating that, you
9 know, people were fining him for not having
10 his rental license, as well. I said, well --
11 so they knew.

12 Q. Okay. Let -- let me back up a
13 little bit. So -- so you -- you had some
14 other dogs in the unit with Mr. Savoy that
15 you've talked about.

16 A. Uh-huh.

17 Q. Were any of these other dogs service
18 animals?

19 A. No. No. Only two of them.

20 Q. Okay. And you described one
21 incident where a dog that was living at your

1 place ultimately, I guess, killed another
2 dog, right?

3 A. Well, no. No. I -- I -- I wouldn't
4 say -- the -- the dog had a heart attack.
5 The dog died. The dog did not kill another
6 dog. The dog died. Now, to finish what
7 happened with that dog, I surrendered that
8 dog to animal control. What happened to her
9 dog? My condo associate -- my condo
10 insurance gave her \$2,500 for that dog.

11 Q. Have -- have any of the dogs that
12 you lived with at Brookside ever had any
13 incidents where they've bitten anybody?

14 A. Bitten anyone?

15 Q. People, right.

16 A. No.

17 Q. Or how about lunged at anyone or
18 anything like that?

19 A. Never. Never.

20 Q. Have any of your neighbors
21 complained to you about the dogs that you've

1 had at Brookside?

2 A. Yeah. They -- they complained
3 about, they're scared. They just said
4 they're scared of dogs. They're scared of
5 those dogs.

6 Q. Have any of the neighbors complained
7 about urine or feces around because of your
8 dogs?

9 A. To me, directly? They, yeah, they,
10 they tried to say that there was urine and
11 feces running down to their unit and it was
12 causing their deck tree road. And I found
13 out that neither of which was true, there was
14 a sewage issue that they had. They had a
15 contractor that had to come in and fix the
16 foundation and the sewage in the laundry
17 room. Only reason I found out, I'm walking
18 by, I'm like, "Did you finish yet?"

19 He said, "Yeah, it should -- it
20 should smell a whole lot better down there."

21 I said, "What do you mean?"

1 A. Okay.

2 Q. Did -- did one of your dogs attack
3 you?

4 A. No. No, it didn't attack me.

5 Q. What happened? Did you get -- you
6 got hurt by one of the dogs?

7 A. I was bit.

8 Q. By which dog?

9 A. The one I know of -- Cashmere --
10 Cashmere bit me.

11 Q. Did -- did -- is that something that
12 Brookside was aware of?

13 A. Not that I know of.

14 Q. Did you have to go to the doctor?

15 A. Yeah. Yeah. Yep.

16 Q. Did you get stitches?

17 A. Yep.

18 Q. How many?

19 A. I don't recall. I -- I -- I -- I --
20 I got out of bed and stepped on her in the
21 dark.

1 Q. And when was that?

2 A. Probably about five or six -- six --
3 no, no, no. This was in 2017, 2018. It was
4 in the other -- it was in the other -- it was
5 in 584.

6 Q. You -- you indicated that one of the
7 dogs can detect blood -- low blood sugar
8 levels; which dog can do that?

9 A. I misspoke on that because I -- I
10 don't actually suffer from -- I misspoke.

11 Q. I think you said that one of the
12 dogs can detect changes in your blood
13 pressure.

14 A. Oh, yeah. Yeah. Yeah. Yeah.

15 Q. Which dog can --

16 A. That -- that was -- that was
17 Cashmere.

18 Q. How can Cashmere detect changes in
19 blood pressure?

20 A. The heart rate, and she can hear,
21 you know, when she put her -- she could tell

1 the -- the heart rate was up.

2 Q. And what makes you say that that's
3 something that she was able to do?

4 What -- how -- what's your basis for
5 saying she could -- detect changes in your
6 heart rate?

7 A. Well, anytime I was sick and my --
8 my blood pressure was up -- well, I didn't
9 know it was up until she started doing
10 certain things, and then I would check my
11 pressure. I was like, 'okay.'

12 Q. What did she do that made -- that
13 made you -- that made you indicate your blood
14 pressure was -- was high?

15 A. She would put her chest against
16 mine, and her heartbeat would sync to my
17 heartbeat. And it -- it slows -- it calms --
18 it slows it down. Right. But I'm not the
19 doctor. But I do know -- I do know that -- I
20 do know that much.

21 Q. I think you also said that one time

1 you fell down and the -- and the dog jumped
2 up on your chest.

3 A. No, I -- I didn't fall, I -- I
4 passed out.

5 Q. And which dog jumped on your chest?

6 A. Mama.

7 Q. And what did she do?

8 A. Basically, she revived me. She, you
9 know, started pressing on my chest and -- and
10 licking me on the face.

11 Q. What do you mean she was pressing on
12 your chest?

13 A. Like with two paws, just jumping.
14 "Wake -- wake up. Wake up."

15 Are we going somewhere with this?

16 Q. What's the matter?

17 A. This is the best way to -- see,
18 she's concerned now and she's about to come.

19 Q. What's the matter? You need a
20 break?

21 A. No. I -- I -- I -- I -- I -- I -- I need